

Matthew W. Gissendanner
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January 29, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Dominion Energy South Carolina, Incorporated's Establishment of a
Solar Choice Metering Tariff Pursuant to S.C. Code Ann. Section 58-40-
20 (See Docket No. 2019-182-E)
Docket No. 2020-229-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Dominion Energy South Carolina, Inc. ("DESC")
is DESC's First Set of Discovery Requests to Alder Energy Systems, Inc.

By copy of this letter DESC is providing a copy of these requests to the parties
of record and encloses a certificate of service to that effect.

If you have any questions or need anything further, please do not hesitate to
contact me.

Very truly yours,


Matthew W. Gissendanner

MWG/kms

Enclosure

cc: Jeffrey M. Nelson, Esquire
Jeffrey W. Kuykendall, Esquire
Jenny R. Pittman, Esquire
Frank Knapp, Jr.
(all via electronic mail only w/enclosures)

Thadeus B. Culley, Esquire
R. Taylor Speer, Esquire
Katherine Lee Mixson, Esquire
David I. Neal, Esquire

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-229-E

Dominion Energy South Carolina, Inc.'s) Establishment of a Solar Choice Metering Tariff) Pursuant to S.C. Code Ann. Section 58-40-20))	DOMINION ENERGY SOUTH CAROLINA, INC.'S FIRST SET OF DISCOVERY REQUESTS
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TO: ALDER ENERGY SYSTEMS, LLC

Pursuant to S.C. Code Ann. Regs. §§ 103-833 and 103-835, and Rule 36 of the South Carolina Rules of Civil Procedure (“SCRCP”), Dominion Energy South Carolina, Inc. (“DESC”), by and through its undersigned counsel, requests that Alder Energy Systems, LLC (“Alder”) answer the corresponding interrogatories under oath and produce all documents or other materials responsive to the corresponding requests for production (collectively, the “Discovery Requests”) within twenty (20) days of the date of service hereof to the address of the undersigned, set forth below.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information, documents, and other materials be provided to the undersigned in the format as requested.
2. That all responses to the below Discovery Requests be labeled using the same numbers as used herein.
3. That if the requested information, documents, or other materials are found in other places or in other exhibits, reference not be made to those, but, instead, that the information,

documents, or other materials be reproduced and placed in the responses to the interrogatory or requests for production in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications be directed to the undersigned.

5. Provide copies of the information responsive to each Discovery Request in native electronic working format with all data (including source data) and formulas intact in an unprotected and unlocked form to allow auditing and verification of inputs, methods, and formulas.

6. That each Discovery Request be reproduced at the beginning of the response thereto.

7. That Alder provide the undersigned with responses to the Discovery Requests as soon as possible, but not later than twenty (20) days from the date of service hereof.

8. If the response to any Discovery Request is that the information requested is not currently available, state why the information is not currently available and when the information requested will become available.

9. The Discovery Requests be deemed continuing so as to require Alder to supplement or amend its responses as any additional information, documents, or other materials become available up to and through the date of hearing.

10. If a privilege not to answer is claimed, identify and describe each matter as to which privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim. In the event that a claim of privilege is raised pursuant to a common interest, provide the common interest agreement or joint defense agreement upon which the privilege is raised.

11. If a refusal to answer is based upon the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.

12. Answer based upon the entire knowledge of Alder, including information in the possession of Alder, its officers, members, parents, subsidiaries, directors, consultants, representatives, agents, experts, and attorneys, if any.

13. If any Discovery Request cannot be answered in full, answer to the extent possible and specify the reasons for Your inability to provide a complete answer.

14. Please provide responses to the Requests electronically. To the extent this is impracticable, the responses, including any responsive documents, should be provided at the address of the undersigned, set forth below, or some mutually convenient location otherwise agreed to by the parties.

DEFINITIONS

1. The term “Docket” shall mean Commission Docket No. 2020-229-E.
2. The term “communication(s)” when used in these Discovery Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.
3. The terms “Alder,” “You,” and “Your” shall mean Alder Energy Systems, LLC, together with its employees, agents, consultants, experts (including Don Zimmerman), subsidiaries, affiliates, parent, and other operational or functional units and all officers, directors, owners, members, employees, agents, and representatives of Alder. The terms also include all other persons acting on behalf of Alder.

4. The term “Certificate Number” shall mean the number of the Certificate of Fit, Willing and Able, if any, issued to You from the ORS pursuant to S.C. Code Ann. § 58-27-2600, et. seq.

5. The term “customer-generator” shall mean any person in DESC’s electric service territory that leases solar distributed generation from You.

6. The term “DESC” shall mean Dominion Energy South Carolina, Inc., formerly South Carolina Electric & Gas Company, together with its employees, agents, consultants, experts, subsidiaries, affiliates, parents, and other operational or functional units and all officers, directors, owners, members, employees, agents, and representatives of these entities. It also includes all other persons acting on behalf of DESC.

7. The terms “document(s)” shall mean all written, recorded or graphic matters whatsoever and all non-identical copies thereof, including but not limited to papers, books, records, letters, photographs, correspondence, communications, electronic mail, text messages, social media records, telegrams, cables, telex messages, evidences of payment, checks, memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings of telephone or other conversations, statements, summaries, opinions, studies, analyses, evaluations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, advertisements, guidelines, charts, manuals, brochures, publications, schedules, price lists, subscription lists, customer lists, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, newsletters, drafts, proofs, galleys, or other prepublication forms of materials, telephone lists or indexes, rolodexes, computer printouts, data processing program libraries, data processing input and outputs, microfilm, microfiches, CD-ROMs, books of account, records or invoices reflecting business operations, all records kept by electronic, photographic, or mechanical means, any notes

or drafts relating to any of the foregoing, and any other documents as defined in Rule 34 of the SCRCF of any kind in Your possession, custody or control or to which You have access or knowledge of its existence. The above list is not meant to be exhaustive but to demonstrate the breadth of the items that may be considered “documents.”

8. The terms “identify” or “identity” used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the time in question. If the person was an officer, director, trustee, commissioner, or employee, also state the job title and areas of responsibility.

9. The terms “identify” or “identity” used with reference to a writing means to state the date, author, type of document (e.g., letter, memorandum, telegram, chart, note, application, etc.), or other means of identification, and its present location or custodian. If any such document is no longer in Your possession or subject to Your control, state what disposition was made of it.

10. The term “Lease” shall mean any document evidencing an agreement, the term of which has not expired or been terminated, by which You lease solar distributed generation to any customer-generator.

11. The term “ORS” shall mean the South Carolina Office of Regulatory Staff, together with its employees, agents, consultants, experts, subsidiaries, affiliates, parent, and other operational or functional units and all officers, directors, owners, members, employees, agents, and representatives of the ORS. The terms also include all other persons acting on behalf of the ORS.

12. The term “Payback Representations and Warranties” shall mean any representation or warranty made by You, in writing or otherwise, to any customer-generator

related to the projected first year during which a solar project leased by You, as lessor, is expected to generate a positive return on investment for the customer-generator.

13. The term “person” shall mean any individual, partnership, firm, association, corporation, government agency, or other business or legal entity.

14. The term “Proposal” shall mean any statements made, or documents provided, to any of Your customers or potential customers that include any of the following information related to rooftop solar: loan terms, lease terms, cash purchase options, system orientation, load profile, generation profile, kWh/kW, orientation, tilt, and assumed module and inverter configuration.

15. The terms “relating to,” “relate to,” and “related to” mean directly or indirectly, expressly or implied, mentioning, describing, pertaining to, being connected with, or reflecting upon the subject matter of the specific request.

16. The term “Testimony” means Witness Zimmerman’s direct testimony and exhibits, if any, submitted in this Docket.

17. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of these Discovery Requests any information which might otherwise be construed outside their scope.

INTERROGATORIES

1. Identify all Leases.
2. Identify all Proposals.
3. Identify all documents known to You that contain Payback Representations and Warranties (this would also include any representations or warranties regarding the availability of the Investment Tax Credit).
4. Identify all documents known to You that contain data regarding system sizes installed by You in South Carolina.
5. Identify all documents known to You that contain data regarding pricing of the rooftop solar systems installed by You in South Carolina.
6. Identify all complaints known to You made by a counterparty under any Lease.
7. Identify all Certificate Numbers.
8. Identify all documents, including, but not limited to, the application, submitted by You to the ORS to obtain any Certificate Number.
9. Identify all regulatory bodies known to You that require “at least one-full year of 8760 data [be] readily available for industry and ratepayers” prior to being placed upon a time-of-use rate in an NEM tariff as You suggest on lines 8-10 on page 15 of the Testimony.
10. Identify all documents known to You containing customer opinions related to payback periods of rooftop solar.
11. Identify all documents known to You containing customer opinions related to return on investment of rooftop solar.

12. Describe with detail and specificity the basis for Your statement on page 7, lines 3-5 of the Testimony that “[a] shorter netting period will inherently discourage larger investments in DG systems.”

13. Describe with detail and specificity Your belief as to what constitutes a “reasonable” return on investment for businesses in South Carolina.

14. Describe with detail and specificity Your belief as to what constitutes a “reasonable” ratio of electricity bill amount to return on investment for Your customers.

15. Describe with detail and specificity the basis for Your statement on page 8, lines 18-21 of the Testimony that “[e]ight years sets the upper limit of an acceptable payback period; C&I customers prefer a range of four to seven years.”

16. Describe with detail and specificity the typical return on investment Your customers can expect during an eight year payback period, as cited on page 8, lines 18-21 of the Testimony.

17. Describe with detail and specificity the basis for Your statement on page 10, lines 14-15 of the Testimony that “[n]onresidential customers, including those in DESC territory rely on annual aggregation to achieve the ROI required for investing in DG.”

18. Describe with detail and specificity the “ROI required for investing in DG,” as cited on page 10, line 15 of the Testimony.

19. Identify all documents known to You that contain return on investment ROI representations.

REQUESTS FOR PRODUCTION

1. Produce all documents identified, described, relied upon, or referred to in responding to DESC's First Set of Interrogatories served contemporaneously herewith.
2. Produce all communications identified, described, relied upon, or referred to in responding to DESC's First Set of Interrogatories served contemporaneously herewith.
3. Produce gross revenue figures for Alder for each of the following fiscal years:
 - a. 2014
 - b. 2015
 - c. 2016
 - d. 2017
 - e. 2018
 - f. 2019
4. Produce Alder's federal tax returns for each of the following fiscal years:
 - a. 2014
 - b. 2015
 - c. 2016
 - d. 2017
 - e. 2018
 - f. 2019
5. Produce Alder's South Carolina tax returns for each of the following fiscal years:
 - a. 2014
 - b. 2015
 - c. 2016

- d. 2017
- e. 2018
- f. 2019

Respectfully Submitted,



K. Chad Burgess, Esquire

Matthew W. Gissendanner, Esquire

Dominion Energy South Carolina, Inc.

Mail Code C222

220 Operation Way

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***Attorneys for Dominion Energy South Carolina,
Inc.***

Cayce, South Carolina
This 29th day of January, 2021.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-229-E

Dominion Energy South Carolina, Inc.'s)
Establishment of a Solar Choice Metering Tariff)
Pursuant to S.C. Code Ann. Section 58-40-20)
_____))
_____)

**CERTIFICATE OF
SERVICE**

This is to certify that I have caused to be served on this day one (1) copy of **DOMINION ENERGY SOUTH CAROLINA, INC.'S FIRST SET OF DISCOVERY REQUESTS** via electronic mail upon the persons named below, addressed as follows:

Frank Knapp, Jr.
fknapp@knappagency.com

Katherine Lee Mixson
klee@selcsc.org

Jeffrey M. Nelson
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David L. Neal
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Thadeus B. Culley
thad@votesolar.org



Karen M. Scruggs

This 29th day of January, 2021